

N3018  
Mawik

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: On-site Inspection

N301864216

FACILITY: HOOVER TREATED WOOD PRODUCTS INC		SRN / ID: N3018
LOCATION: 7500 E DAVISON AVE, DETROIT		DISTRICT: Detroit
CITY: DETROIT		COUNTY: WAYNE
CONTACT: Robert Siebenaler , Plant Manager		ACTIVITY DATE: 08/16/2022
STAFF: Jill Zimmerman	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MINOR
SUBJECT: Inspection with EPA		
RESOLVED COMPLAINTS:		

**DATE OF INSPECTION** : August 16, 2022

**INSPECTED BY** : Jill Zimmerman

**PERSONNEL PRESENT** : Robert Siebenaler, Plant Manager and Maintenance Technician, Hoover  
 Jeff Welch, Maintenance Manager, Hoover  
 Curtis Rhodes, VP of Operation (Phone)  
 Tess Russell, EPA  
 Emma Leeds, EPA  
 Laura Steel Neudorf, EPA

**FACILITY PHONE NUMBER** : 313-365-9460 x112

**FACILITY EMAIL** : rsiebenaler@frtw.com

### FACILITY BACKGROUND

Hoover Treated Wood Products, Inc pressure treats plywood and lumber. The facility employs approximately 53-60 people. The facility is located in a combination of industrial and residential area. The facility operates two shift per day.

### REQUIRED PPE

During the onsite inspection, I was required to wear steel toed shoes, safety vest, hard hat, and safety glasses.

### COMPLAINT/COMPLIANCE HISTORY

No complaints have been received regarding this facility in the past year.

### PROCESS EQUIPMENT AND CONTROLS

The facility operates three pressure treatment cylinders that are used daily. Raw material spruce or Douglas fir wood is brought to the facility previously dried by the manufacturer.

The wood is placed in one of the pressure treatment vessels to be treated. Two of the vessels treat the wood with Pyro-Guard which is a fire retardant. The third vessel treats the wood with chromated copper arsenate (CCA). Vacuum is applied in the vessel after the chemical is applied to remove wet air and start the drying process. Next, the wood is placed in a gas fired kiln at approximately 155 F to continue drying until a moisture content between 15-18% is achieved. The drying process can take between 12 hours and 3 days depending on the type of wood. Finally the dried wood is stored in the yard until it is shipped off site.

## **INSPECTION NARRATIVE**

On August 16, 2022, I along with Ms. Russell, Ms. Leeds and Ms. Neudorf from the USEPA, arrived at the facility for an unannounced inspection. Initially we discussed the process with Mr. Siebenaler. This facility currently is operating without permits. During the preinspection interview, Mr. Siebenaler stated that the facility does not have any air emissions or air control devices.

Next, we walked through the facility to observe the process. Raw materials are brought into one of the pressure treatment vessels and the treatment chemicals are added. The treatment chemicals contain chromium and arsenic. When the treated wood is removed from the vessels, commonly, some of the treatment chemical drips from the wood into an area of the facility with a containment area. The wood is next dried in one of the seven kilns. There are also two 150 horsepower natural gas fired boilers.

## **APPLICABLE RULES/PERMIT CONDITIONS**

Currently, this facility does not have any operating permits. This facility is an area source for HAPs; the PTE for HAPs is less than 1 ton per year based on the information supplied by the company. NESHAP 6Q for Wood Preserving Area Sources is enforced by EPA; AQD has not accepted delegation for this area source standard. On March 24, 2023 I sent Mr. Siebenaler an email requesting additional records from the facility. The response to this email is attached to this report. Based on the information submitted by the facility, the equipment is exempt from permitting by Rule 291 with a report attached demonstrating compliance with this exemption. Therefore, no records to show compliance with Rule 290 are required. The SDS are attached to this report for the chemicals used to treat the wood. The company also submitted some confidential information for the chemicals used at the facility. The facility does not use any air pollution control devices.

## **MAERS REPORT REVIEW**

At this time, the facility is not required to submit MAERS.

## **FINAL COMPLIANCE DETERMINATION**

**Hoover Treated Wood Products appears to be operating in compliance the AQD rules. Based on the PTE calculations received from the facility, it appears that the facility does not require a permit to install to comply with state regulations. AQD has not accepted delegation to implement and enforce the NESHAP 6Q for Wood Preserving Area Sources.**

NAME 

DATE 7/11/2024

SUPERVISOR 